

Honorable John C. Coughenour
Honorable James L. Robart

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,
v.
ALAN GOMEZ-MARENTES, et al.,
Defendants.

CASE NO. CR20-092JCC

NOTICE OF RELATED CASES

UNITED STATES OF AMERICA,
Plaintiff,
v.
CESAR VALDEZ-SANUDO, et al.,
Defendant.

CASE NO. CR20-217JCC

NOTICE OF RELATED CASES

UNITED STATES OF AMERICA,
Plaintiff,
v.
GERSON FLORES-RIVERA,
Defendant.

CASE NO. CR21-096JLR

NOTICE OF RELATED CASES

Comes now the United States of America, by Tessa M. Gorman, Acting United
States Attorney for the Western District of Washington, and Amy Jaquette, Assistant

NOTICE OF RELATED CASES

United States v. ALAN GOMEZ-MARENTES, et al., CR20-092JCC

United States v. CESAR VALDEZ-SANUDO, et al., CR20-217JCC

United States v. GERSON FLORES-RIVERA, CR21-096JLR – 1

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1 United States Attorney for said District, and respectfully submits the following Notice of
 2 Related Cases pursuant to Local Criminal Rule 13(a) and (b). The three cases captioned
 3 above are related cases.

4 On July 23, 2020, the Grand Jury charged 19 members of a large drug trafficking
 5 organization (DTO) with one count of Conspiracy to Distribute Controlled Substances, in
 6 violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1) and 846 (Count
 7 1), and charged a subset of those individuals with one count of Possession with Intent to
 8 Distribute Methamphetamine, in violation of Title 21, United States Code, Sections
 9 841(a)(1), 841(b)(1) and 846 (Count 2), among other crimes. (CR20-092JCC, Dkt. 1.)
 10 On July 28, 2020, agents arrested many of the indicted defendants during a coordinated
 11 takedown of the investigation. On August 7, 2020, the grand jury returned a Superseding
 12 Indictment charging a number of substantive counts and one additional defendant.
 13 (CR20-092JCC, Dkt. 152.) On April 1, 2021, the grand jury returned a Second
 14 Superseding Indictment charging the same counts and adding one additional defendant.
 15 (CR20-092JCC, Dkt. 378.)

16 The July 2020 takedown was the culmination of more than a year of investigation
 17 into a drug trafficking organization (DTO) distributing multi-kilo quantities of narcotics
 18 in Western Washington. The investigation was led by the Drug Enforcement
 19 Administration, in partnership with Homeland Security Investigations, the Bureau of
 20 Alcohol, Tobacco, Firearms, and Explosives, and the Federal Bureau of Investigation.
 21 The investigation began in January 2019 and involved numerous periods of court-
 22 authorized wiretaps, controlled purchases of drugs using confidential sources, and
 23 hundreds of hours in physical and electronic surveillance.

24 At the time of the takedown in CR20-092 JCC, investigators elected to hold off on
 25 indicting (or arresting) a subset of the targets of the investigation – specifically, Cesar
 26 VALDEZ-SANUDO and his criminal associates. Rather, agents continued to investigate
 27 this group of individuals and received court-authorization to conduct additional wiretaps.
 28

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On December 9, 2020, the Grand Jury returned an Indictment charging this subset of the larger investigation in a separate conspiracy. This Indictment charged 11 members of a drug trafficking organization (DTO) with one count of Conspiracy to Distribute Controlled Substances, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1) and 846 (Count 1), and two of those individuals in a related count of Conspiracy to Commit Money Laundering (Count 3), in violation of Title 18, United States Code, Section 1956. (CR20-217JCC, Dkt. 1.)¹ On December 16, 2020, agents arrested the 11 indicted defendants during a coordinated takedown of the investigation.

As before, investigators elected to hold off on indicting (or arresting) certain targets of the investigation, including Gerson FLORES-RIVERA. Investigators intercepted FLORES-RIVERA during the same wiretaps that led to charges in CR20-092 JCC and CR20-217JCC. After the July and December 2020 takedowns, investigators continued to investigate FLORES-RIVERA's drug trafficking activity by conducting controlled purchases from FLORES-RIVERA. (MJ21-318BAT, Dkt. 1). The investigation into FLORES-RIVERA culminated in the execution of a search warrant at FLORES-RIVERA's residence and the seizure of large quantities of drugs and two guns. (*Id.*)

On June 9, 2021, Grand Jury returned an Indictment against Gerson FLORES-RIVERA charging him with Distribution of Methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) (Count 1); Possession with Intent to Distribute Fentanyl, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) (Count 2); Possession with Intent to Distribute Methamphetamine, Heroin, and Fentanyl, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) (Count 3); and Carrying a Firearm During and in

¹ This case was originally assigned to the Honorable Richard A. Jones; the Court reassigned the case to the Honorable John C. Coughenour after the United States filed a Notice of Related cases.

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1 Relation to a Drug Trafficking Crime, in violation of Title 18, United States Code,
 2 Section 924(c)(1)(A)(i) (Count 4). (CR21-096JLR, Dkt. 12.)

3 Although the United States does not intend to seek to join CR20-217JCC and
 4 CR20-092JCC with CR21-096JLR for trial, it does seek to litigate any challenges to the
 5 underlying investigation – which will necessarily rely on common issues of law and fact
 6 – before the same Court. In particular, the United States will seek to rely on intercepted
 7 drug and gun-related conversations in the prosecution of FLORES-RIVERA to establish
 8 his culpability for the charged offenses at any future trial and to demonstrate the full
 9 scope of FLORES-RIVERA’s relevant conduct at any future sentencing. With respect to
 10 the wiretap evidence, all three of these cases involve the same wiretap pleadings,
 11 common co-conspirators, and contain instances of overlapping surveillance. Due to the
 12 overlap between the three cases, the United States files this notice of related cases and
 13 requests that all three cases be assigned to the same judge.

14 DATED this 23rd day of June, 2021.

16 Respectfully submitted,

17 TESSA M. GORMAN
 18 Acting United States Attorney

19 /s/ Amy Jaquette

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